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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

THE ESTATE OF STEPHEN ROMNEY  
SWENSEN, and CREW CAPITAL GROUP,  
LLC, a Nevada limited liability company,

Defendants,

WENDY SWENSEN, an individual, SARIA  
C. RODRIGUEZ, an individual, WS  
FAMILY IP, LLC, a Utah limited liability  
company, WINGMAN, LLC, a Utah limited  
liability company, and SWENSEN  
CAPITAL, LLC, a Utah limited liability  
company,

Relief Defendants.

**MOTION FOR ENTRY OF CONSENT  
JUDGMENTS**

Case No.: 1:22-cv-00135-RJS-DBP

Judge: Robert J. Shelby

Magistrate Judge: Dustin B. Pead

Plaintiff the Securities and Exchange Commission (the “SEC”) moves for entry of consent judgments as to Defendants The Estate of Stephen Romney Swensen and Crew Capital Group, LLC; and Relief Defendants Wendy Swensen, Wingman, LLC, and Swensen Capital, LLC (herein, the “Consenting Defendants”). In support of this motion, the SEC states as follows:

1. The SEC and the Consenting Defendants have reached agreements to partially settle the SEC’s claims as to those defendants via entry of the attached Consent Judgments.
2. The Consenting Defendants have executed Consents to the proposed Consent Judgments. Those Consents are attached hereto as Exhibits 1–5.
3. The proposed Judgments to which the Consenting Defendants have consented are attached hereto as Exhibits 6–10.
4. Entry of the proposed judgments will resolve the SEC’s claims as to injunctive relief as to the Consenting Defendants, leaving only the SEC’s claims for monetary relief as to those defendants. Pursuant to the proposed judgments, the SEC may request, and the Court may award, such monetary relief upon further motion.

Accordingly, the SEC respectfully requests that the Court grant this Motion and enter the proposed Consent Judgments as to Defendants The Estate of Stephen Romney Swensen and Crew Capital Group, LLC; and Relief Defendants Wendy Swensen, Wingman, LLC, and Swensen Capital, LLC.

Dated: September 8, 2023

/s/ Casey R. Fronk  
Casey R. Fronk

*Counsel for Plaintiff SEC*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 8, 2023, I caused a true and correct copy of the foregoing document to be served via CM/ECF on the following:

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/s/ Casey R. Fronk  
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